Rejection of Claims:

In paragraph 3 of the Action, claims 1-8, 11-19, 21 & 22 are rejected under 35 U.S.C. 103(a) as being unpatentable over Charny in view of Cloonan. In addition, in paragraph 4 and 5 of the Action, claims 9, 10, and 23-33 are rejected under 35 U.S.C. 103(a) as being unpatentable over Charny in view of Cloonan and further in view of Momirov. The rejection of claims 1-11 and 23-33 on the above stated grounds is respectfully traversed.

Claim 1, as currently amended, states:

> A switching fabric for transmitting data frames to destinations, each data frame specifying a destination, the switching fabric comprising:
> a plurality of input ports...; and
> a plurality of crossbar sections...,
> wherein *each input port includes logic for scheduling the transmission of each data cell... to any output port, based upon an ability of a crossbar section to receive the data cells*.

Emphasis added.

As is well-established, to make a *prima facie* rejection of obviousness under 35 USC 103(a), the prior art reference (or references when combined) must disclose or suggest all the claim limitations. See MPEP 2143. In this case, as developed more fully below, Applicants respectfully submit that this burden has not been met.

Charney discloses an arbiter (32) which is *located in the crossbar unit* (24) and which has the goal of computing "a maximal (conflict-free) match between the input and output channels...." See column 7, lines 9-18. Further, Charney discloses that "the arbiter decides which input can send a cell to which output...." See column 7, lines 34-35.

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Applicants respectfully submit that Charney fails to disclose _each input port_ including

logic for scheduling the transmission of each data cell... to any output port based upon an ability

of a crossbar section to receive the data cells. Rather Charney teaches away from logic at the

input port when Charney teaches of an arbiter _located in the crossbar unit_ for deciding which

input can send a cell to which output. Accordingly, Applicants respectfully submit that Chaney

fails to disclose the above stated element of claim 1.

The Cloonan reference is cited in the Action to address the acknowledged lack of an

expressly disclosed crossbar switch with multiple crossbar sections. See Action, page 3.

However Cloonan wasn't cited to teach or suggest of the element of logic _at the input port_ for

scheduling the transmission of each data cell, as described in claim 1. Furthermore, Cloonan

does not disclose or suggest separate logic associated with each of the input ports as provided in

claim 1. Rather, Cloonan discloses logic _in the cross bar_ coupled to the pipes in the switch

fabric to control routing of content from the input ports. See Figures 3-5.

Indeed, Cloonan fails to disclose or suggest scheduling of input content to the individual

pipes at all. Instead, all content from each input port is non-selectively routed to each pipe,

where _centralized control logic_ in the switch controls the pipes to determine which pipe forwards

individual content (Fig. 5 and col. 10, lines 35-45).

For at least the foregoing reasons, it is respectfully requested that the Examiner withdraw

rejection of claim 1.

Independent claims 12 and 23 both include a similar element to claim 1. In particular,

claim 12 contains the element of _scheduling at an input port_ the transmission of each data cell...

based upon an ability of a crossbar section to receive each data cell. Claim 23 also recites a

similar element to claim 12. Accordingly, claims 12 and 23 are patentable over the cited

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references for the same reasons as those presented for claim 1. Therefore, Applicants respectfully request that the Examiner withdraw rejection of claims 12 and 23.

Additionally, in relation to the Action's reference to Momirov for rejection of claim 23, Applicants respectfully submit that Momirov was not cited to cure, and does not in fact cure, the deficiencies in Charny and Cloonan stated above. Therefore, for at least the foregoing reasons, it is respectfully requested that the Examiner withdraw rejection of claim 23.

Applicants note that claims 2-11, 13-22 and 24-33 depend from patentable base claims 1, 12 and 23 respectively. As a result, in addition to any independent bases for patentability, Applicants respectfully submit that claims 2-11, 13-22 and 24-33 are patentable over the cited references by virtue of at least this dependence. Thus, Applicants respectfully requests that the 35 U.S.C. 103(a) rejections of 2-11, 13-22 and 24-33 be withdrawn.

Conclusion

For at least the foregoing reasons, Applicants respectfully submit that claims 1-33, are in condition for allowance and such action is earnestly solicited. *The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.*

Respectfully submitted,
Robert M. Grow et al.

Date: _____   by:_____
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